



"Collins, Chuck" <chuck.collins@cas-inc.com> on 05/29/2001 12:57:51 PM

To: farcase.2001-014@gsa.gov
cc:

Subject: FW: FAR Case 2001-014

2001-014-124

> Dear Sir:
>
> CAS, Inc. requests that the FAR Council repeal the "Blacklisting Rule"
> based on the following points:
>
> 1. It is not clear that the added categories of covered laws
> and implementing certifications are justified.
> 2. It is questionable that the rule provides contracting
> officers with sufficient guidelines to prevent arbitrary
> implementations.
> 3. It is not a cost effective approach.
> 4. Sufficient leadtime was not allowed for adequate
> implementation of the rule.
> 5. Suspensio and debarment procedures are in place to deal with
> the issue of undesirable contractors.
> 6. The Blacklisting Rule appears to be arbitrary and
> capricious.
> 7. The rule is viewed as contrary to law because it could deny
> contractors the right to due process and is vague.
> 8. The FAR Council has not properly evaluated the Rule's impact
> on small businesses and imposes a significant paperwork burden.
>
> Thank you for your consideration.
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>
> Charles W. Collins
> Manager, Contracts Department
> CAS, Inc.

Rec'd
5/29/01